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September 23, 2016

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, DC 19801

VIA ELECTRONIC FILING

Re: *The Gillette Company v. Dollar Shave Club, Inc.*,
C.A. No. 15-1158 (LPS)

Dear Chief Judge Stark:

The parties write to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (in person and/or by telephone) on September 20, 2016:

Delaware Counsel: Rodger Smith, Morris, Nichols, Arsht & Tunnell LLP
(for Plaintiff The Gillette Company)

Karen Keller, Shaw Keller LLP
(for Defendant Dollar Shave Club, Inc.)

Lead Counsel: Jennifer Albert, Goodwin Procter, LLP
(for Plaintiff The Gillette Company)

Terry Wit, Quinn Emanuel Urquhart & Sullivan, LLP
(for Defendant Dollar Shave Club, Inc.)

The disputes requiring judicial attention are listed below:

- Gillette's request that Dollar Shave Club produce additional technical documentation concerning the accused products, including the coatings on the razor blades in the accused products, the manufacturing processes used to manufacture the blades in the accused products, and the materials used during manufacturing of the blades in the accused products;

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- Gillette's request that Dollar Shave Club produce documents concerning razors that have been in development or considered for commercialization, if any; and
- Dollar Shave Club's objection pursuant to Paragraph 6 of the Protective Order (D.I. 20) to Gillette's designation of its Initial Claim Charts and Attachments A-C as "Highly Confidential – Outside Counsel's Eyes Only."

We request that the Court set a briefing and hearing schedule for these issues.

Respectfully,

/s/ Rodger D. Smith II

Rodger D. Smith II (#3778)

RDS/rah

cc: Clerk of the Court (via hand delivery)
All Counsel of Record (via electronic mail)